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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

EDDY CHINCHILLA, as an Individual,

Plaintiff/Petitioner,

vs.

BELLAGIO, LLC, as the Employer,

Defendant/Respondent.

Case No: 2:13-cv-01000-GMN-NJK

**STIPULATION AND REQUEST FOR
EXTENSION OF TIME TO SUBMIT
DISCOVERY PLAN AND
SCHEDULING ORDER**

(First Request)

COME NOW Plaintiff, Eddy Chinchilla (“Plaintiff”), and Defendant Bellagio, LLC (“Defendant” or “Bellagio”), by and through their respective counsel of record, and request that the Court grant a short two (2) business day extension of the time for the parties to submit their Stipulated Discovery Plan and Scheduling Order, from September 5, 2013 to September 9, 2013. This is the first request for any such extension.

In support of this Stipulation and Request, the parties state as follows:

1. The parties conducted their Fed. R. Civ. P. 26(f) conference today, September 5, 2013, and exchanged two drafts of the Stipulated Discovery Plan and Scheduling Order.

2. The parties are assessing seeking a stay of discovery pending the Court’s resolution of Defendant’s Motion to Dismiss (Docket #4) and the applicable standards for the same. See Ministerio Roca Solida v. U.S. Dep’t of Fish & Wildlife, 288 F.R.D. 500, 502-04 (D. Nev. 2013).

3. Plaintiff's counsel had a family/childcare issue precluding continued discussions this afternoon and evening concerning the Stipulated Discovery Plan and Scheduling Order and both parties seek two (2) more business days to consider the attendant issues.

4. This stipulation and request for a two (2) business day extension of time is not sought for any improper purpose or other purpose of delay. Rather, it is sought by the parties solely for the purpose of allowing sufficient time to orderly complete necessary tasks associated with this case.

WHEREFORE, the parties respectfully request that this Court extend the date for the parties to submit their Stipulated Discovery Plan and Scheduling Order, from September 5, 2013 to September 9, 2013.

DATED: September 5, 2013

DATED: September 5, 2013

KANG & ASSOCIATES, PLLC

KAMER ZUCKER ABBOTT

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Attorneys for Defendant

ORDER

IT IS SO ORDERED.

September 6, 2013
DATE: _____



United States Magistrate Judge